

SLR:LDM:TRP
F. #2017R01691

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

19-CR-408 (SJ)

ISKYO ARONOV,
also known as “Isaac Aronov,”
MICHAEL KONSTANTINOVSKIY,
also known as “Michael Kay,”
TOMER DAFNA,
also known as Tomar Dafna,
AVRAHAM TARSHISH,
also known as “Avi Tarshish,” and
MICHAEL HERSKOWITZ,

Defendants.

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The United States of America, by and through RICHARD P. DONOGHUE, United States Attorney for the Eastern District of New York, and Tanisha R. Payne, Assistant United States Attorney, hereby files the following Bill of Particulars for forfeiture of property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and 982(a)(2), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that it seeks forfeiture of the following property:

1. The real property and premises located at 120 Marcus Garvey Blvd, Brooklyn, New York 11206, and all proceeds traceable thereto;
2. The real property and premises located at 318A Hart Street, Brooklyn, New York 11206, and all proceeds traceable thereto;

3. The real property and premises located at 354 Stuyvesant Avenue, Brooklyn, New York 11233, and all proceeds traceable thereto;
4. The real property and premises located at 223-38 109th Avenue, Queens Village, New York 11429, and all proceeds traceable thereto;
5. The real property and premises located at 230 Schenectady Avenue, Brooklyn, New York 11213, and all proceeds traceable thereto;
6. The real property and premises located at 296 Fenimore Street, Brooklyn, New York 11225, and all proceeds traceable thereto; and

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
September 10, 2019

RICHARD P. DONOGHUE
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Eastern District of New York
271-A Cadman Plaza East
Brooklyn, New York 11201

By: /s *Tanisha R. Payne*
Tanisha R. Payne
Assistant United States Attorney
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To: All Counsel of Record (by ECF)